

5. In early April 2021, the Epsteins informed Defendants' attorneys that the Defendants would endeavor to obtain an order in the divorce litigation, which order would enable the parties to collaborate, obviating the need for withdrawal of Defendants' attorneys. Since then the Defendants have refused to authorize any legal services by their attorneys in this litigation, except to attempt to settle this litigation; and the Defendants have refused to pay for legal services under the preexisting legal services engagement letters between the Defendants and their attorneys in this litigation.
6. There was a hearing scheduled Today, Friday, July 9, 2021 in Cause D-1-FM-20-006199 to obtain temporary orders, which hearing was canceled by one of the Defendants' divorce attorneys.
7. Neither of the Defendants nor their divorce attorneys could give me a date certain when Cause D-1-FM-20-006199 will be set for hearing. Attorney James Minerve's best estimate is within three weeks the court in Cause D-1-FM-20-006199 will issue temporary orders.
8. Defendants' attorneys in this litigation need three weeks to file a response to the Plaintiff's Motion for Summary Judgment.
9. Opposing counsel is only unopposed to a fourteen-day extension to respond to Defendant's Motion for Summary Judgment, provided the Defendants agreed to not seek any additional extensions to respond to the Plaintiff's Motion for Summary Judgment.
10. Plaintiffs request a Six (6) week extension of time to file their Response such that Plaintiffs' Response will be due on August 20, 2021.

WHEREFORE, PREMISES CONSIDERED, Defendants pray that this Court grant their Motion for Extension of Time to File their Response to Plaintiff's FRCP 56 Motion for Summary Judgment and extend their deadline to file same to August 20, 2021.

Respectfully submitted,
By: /s/ James Minerve

James Minerve
State Bar No. 24008692
13276 N HWY 183, Suite 209
(888) 819-1440 Office
(210) 336-5867 Mobile
(888) 230-6397 Fax
jgm@minervelaw.com
Attorney for Defendants

CERTIFICATE OF CONFERENCE

On July 9, 2021, the undersigned counsel for Defendants conferred with Plaintiff's counsel, Tate L. Hemingson, concerning the foregoing Motion and Mr. Hemingson stated that he and his Client are opposed to this Motion; however, they are unopposed to a two week extension, provided the Defendants did not request any additional extensions to respond to Plaintiff's Motion for Summary Judgment.

/s/ James Minerve

James Minerve

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of July 2021 a true and correct copy of the above and foregoing document was sent via the Court's electronic filing notification system and via e-mail to the following:

Tate L. Hemingson
State Bar No. 24064370
901 Main Street, Suite 6000
Dallas, Texas 75202
214-651-4300 Telephone
214-651-4330 Fax
Tate.Hemingson@clarkhillstrasburger.com

/s/ James Minerve

James Minerve